

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

ROBERT KEITH MILLER,

Plaintiff,

v.

CITY OF CHICKASAW, ALABAMA

and

BARRY BROADHEAD, in his individual

and official capacity as Mayor of the

City of Chickasaw,

Defendants.

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Civil Action No.: 1:24-cv-00058-WS-N

NOTICE OF DEPOSITIONS

TO: Thomas O. Gaillard, III, Esq.
Jan McElroy, Court Reporter

DEPONENTS: Nash Campbell
Jennifer White

DATES: Wednesday, October 1, 2025
Thursday, October 2, 2025

TIME: Campbell: 9:30 a.m. on 10/01/2025
White: 9:30 a.m. on 10/02/2025

LOCATION: Law Office of Helmsing, Leach, Herlong, Newman & Rouse, P.C.
150 Government Street, Suite 2000
Mobile, Alabama 36602
251-432-5521

Please take notice that Plaintiff's counsel will take the deposition of the above-named deponents as set out upon oral examination pursuant to the *Federal Rules of Civil Procedure* before the identified officer, Jan McElroy, who is duly authorized to administer oaths and swear witnesses in the county and state where the depositions are to be taken. The oral examinations

will continue from day to day or from time to time until completed. You are invited to attend and participate if you so choose.

Respectfully submitted,

/s/ Edward L. D. Smith

Attorney for Plaintiff

EDWARD L.D. SMITH
Post Office Box 1643
Mobile, Alabama 36633-1643
(251) 431-9000
edward@edwardsmithlaw.com

CERTIFICATE OF SERVICE

I certify that on this the 25th day of September, 2025, the foregoing document was served electronically to the following counsel and a Notice of Discovery was filed with CM/ECF which will send email notification to counsel of record:

Thomas O. Gaillard, III via TOG@helmsinglaw.com

/s/ Edward L. D. Smith

EDWARD L. D. SMITH